

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Kenneth Eng

(In the space above enter the full name(s) of the plaintiff(s).)

-against-

COMPLAINT

RFR Realty

Deloy Stoll

Jury Trial: ☐ Yes ☒ No
(check one)

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

APR - 4 2014

PRO SE

I. Parties in this complaint:

- A. List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff Name Kenneth Eng

Street Address 4266 Saull Street

County, City Flushing

State & Zip Code NY 11355

Telephone Number

- B. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1 Name RFR Realty

Street Address 17 State Street, 4th Floor

County, City NYState & Zip Code NY 10004

Telephone Number _____

Defendant No. 2

Name Deloy Stoll, RPAStreet Address 17 State StreetCounty, City NYState & Zip Code NY 10004

Telephone Number _____

Defendant No. 3

Name _____

Street Address _____

County, City _____

State & Zip Code _____

Telephone Number _____

Defendant No. 4

Name _____

Street Address _____

County, City _____

State & Zip Code _____

Telephone Number _____

II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. Only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case.

- A. What is the basis for federal court jurisdiction? *(check all that apply)*
- ☒ Federal Questions ☐ Diversity of Citizenship

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? _____
- 28 U.S.C. §4101(1)

- C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?
- Plaintiff(s) state(s) of citizenship _____
- Defendant(s) state(s) of citizenship _____

III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events.

You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? 17 State Street, NY, NY 10004

B. What date and approximate time did the events giving rise to your claim(s) occur? Early December 2013.

C. Facts:

What happened to you?

Security at 17 State Street, which is owned by RFR Realty on the 4th floor, asked an associate who was working at Gorlick, Kravitz and Listhaus to inspect an incident involving me earlier on a day in December 2013. The firm is also located on the 4th floor.

Who did what?

I learned recently from a document written by Gorlick, Kravitz and Listhaus that this was a lie. This is what the document states:

Was anyone else involved?

"In early December 2013, a GKL associate, upon entering the building, was asked by a security employee about an alleged incident earlier that day involving Mr. Eng. Apparently, another building security employee told his coworkers that he had to go to GKL's office on the fourth floor to handle an incident involving Mr. Eng."

Who else saw what happened?

Towards the bottom of the document, the footnote states: "There was no actual incident. The building security employee told this story because he did not want his coworkers to know he was going up to the building management office, which is on the same floor as GKL." I would also like to add that I think this was racially motivated, as most of the security guards at RFR and in the lobby are niggers and I am Asian. Furthermore, in October 2013, Deloy Stoll, a black guard, attempted to intimidate me and insult me by saying, "Hey, where you

IV. *(Please see back)*
Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received.

V. Relief:

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation. _____
RFR's actions ultimately led to events that resulted in my termination from the law firm. I am seeking \$4,000,000 from RFR Realty and its employees who were responsible.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this² day of April, 20¹⁴.

Signature of Plaintiff



Mailing Address

4266 Saull Street

Flushing, NY 11355

Telephone Number

Fax Number (if you have one)

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint. Prisoners must also provide their inmate numbers, present place of confinement, and address.

For Prisoners:

I declare under penalty of perjury that on this _____ day of _____, 20____, I am delivering this complaint to prison authorities to be mailed to the *Pro Se* Office of the United States District Court for the Southern District of New York.

Signature of Plaintiff:

Inmate Number

"going? You need to scan your ID. You
do your job, I do mine." This was an
attempt to intimidate me. Coons do this all
the time.